

**Frequently Asked Questions and Answers**  
**Adolescent Family Life Demonstration Program**

**General Questions**

- (1) Question: Who administers the Adolescent Family Life (AFL) Demonstration Projects Grant Program?**

**Answer:** The Office of Adolescent Pregnancy Programs (OAPP), Office of Population Affairs, Office of Public Health and Science, U.S. Department of Health and Human Services, administers the program.

- (2) Question: What is an Adolescent Family Life Demonstration Project?**

**Answer:** An Adolescent Family Life Demonstration Project is a project of limited duration designed to test the feasibility and effectiveness of a theory or approach consistent with the purposes of the legislation. Such demonstrations must be designed in such a way that they can be assessed or evaluated using standard field research methods and replicated in similar situations.

- (3) Question: Who is eligible to receive an OAPP demonstration grant?**

**Answer:** Eligible grant recipients are limited to public or private nonprofit organizations or agencies which demonstrate to the satisfaction of the Secretary the capability of providing the appropriate services. Faith-based organizations are eligible to apply for these demonstration grants.

- (4) Question: May an individual submit a grant application?**

**Answer:** Grants are awarded to organizations rather than individuals. A grant application may be submitted by an individual authorized to act/sign for an organization and to assume the obligations imposed by the legislation and any additional conditions of the grant. However, the grant will not go directly to that individual but to the organization which the individual represents. The organization must establish its non-profit status prior to the issuance of a grant award and accept the responsibility for the use of Federal funds.

- (5) Question: How should applications be submitted?**

**Answer:** Applicants should submit the original application and *two* copies. The original should be signed by the individual authorized to act/sign for the organization and to assume the obligations imposed by the legislation and any additional conditions of the grant.

Applications should be submitted on Form OPHS-1 with the Table of Contents, Narrative (not to exceed 50 double-space pages typed on one side of the paper), and Appendices on paper no larger than 8-1/2 x 11. The OPHS-1 can also be downloaded from the INTERNET at the following address: <http://opa.osophs.dhhs.gov/>. All pages must be numbered. Applications should be either secured in the upper left corner (no staples) or attached with rubber bands. Applicants should **not** use covers, binders or tabs and should not include extraneous materials such as agency promotional brochures, slides, tapes, film clips, computer diskettes, etc. It is not feasible to use such items in the review process, and they will be discarded if included.

Applications delivered by the U.S. Postal Service, by a commercial carrier such as Federal Express, or hand-delivered must be submitted to: Grants Management Office, OPA, 4350 East-West Highway, Suite 200, Bethesda, MD 20814.

Applications sent by FAX will not be accepted.

**(6) Question: Should the application narrative be submitted in a specific format?**

**Answer:** Yes. A suggested outline is provided in the Program Narrative: General Guidance section of this application kit. The typed, double-spaced, 50 page limitation (plus appendices) should be observed (see Enclosure #6). All pages in the application should be numbered.

**(7) Question: What is the latest date the grant awards can be issued?**

**Answer:** Grant awards under this program announcement must be issued no later than September 30, 2002.

**(8) Question: Are AFL Demonstration projects subject to Intergovernmental Review under Executive Order 12372?**

**Answer:** Yes. Applicants should contact the State Single Point of Contact (SPOC) if the state in which services will be provided participates in this review process. The most current list of SPOCs, as well as a list of those states not participating, is included in this application kit. An applicant may comply with this requirement by submitting a copy of the application to the state SPOC in which the applicant is located at the same time the application is submitted to OAPP.

**(9) Question: Are there any other non-Federal reviews required for the demonstration grant applications?**

**Answer:** Yes. The Governor of the State in which services will be provided must be given 60 days to comment on the application. In order to comply with this requirement, an

applicant can mail a copy of their application to the Governor of their State **at the same time the application is mailed to OAPP**. To inform the Governor's office of the reason for the submission, a copy of this notice should be attached to the application.

**(10) Question: What is the Catalog of Federal Domestic Assistance number?**

**Answer:** All Federal domestic assistance programs are assigned an identifying number by the Office of Management and Budget. OAPP's number for AFL demonstration projects is 93.995. These numbers are used as a reference to available programs and are published in a complete catalog for easy access by any interested organizations or members of the public.

**(11) Question: Will OAPP extend the deadline for submission of applications?**

**Answer:** No.

**(12) Question: Who will make the funding decision?**

**Answer:** Final grant award decisions will be made by the Deputy Assistant Secretary for Population Affairs, who will take into consideration a review by a multidisciplinary panel of independent reviewers in accordance with objective review criteria as stated in the program announcement.

Questions Regarding Program Implementation

**(13) Question: Does OAPP provide any technical assistance to grantees who have been awarded an AFL grant?**

**Answer:** Yes. Project Directors and Program Evaluators are required to attend an annual meeting which provides assistance in the area of program development, evaluation, AFL policy and many other areas of interest. Travel and logistics for annual and initial orientation meetings must be estimated and included in the applicant's budget. OAPP also provides annual technical assistance workshops for grantee staff in a variety of areas and locations across the country. Travel and logistics related for these training workshops are arranged and paid for by Development Systems, Inc. (DSI), a grantee responsible for conducting technical and training for OAPP programs. On-site technical assistance is available for grantees as requested. Additionally, each grantee will have a Project Officer assigned to the project. The OAPP Project Officer provides one-on-one technical assistance via phone, site visit, and mail.

**(14) Question: If a program receives technical assistance from OAPP during the application process, does this assistance give the applicant priority for funding?**

**Answer:** No. An applicant who receives technical assistance from OAPP during the

application process will not receive any special consideration for funding.

- (15) Question: Must Adolescent Family Life Demonstration projects charge fees for services?**

**Answer:** Yes. Section 2004(c) of the Title XX statute states that AFL demonstration project grantees "... shall charge fees for services pursuant to a fee schedule approved by the Secretary . . ."

- (16) Question: How are fees for services to be determined?**

**Answer:** Fees for services are to be based on all reasonable direct and indirect costs incurred in the provision of the service.

- (17) Question: Must full fees for services be charged to all clients?**

**Answer:** No. The amount of a fee to be charged shall be adjusted on the basis of the ability of the eligible person to pay.

- (18) Question: Must a fee schedule be submitted with a grant application?**

**Answer:** Yes. A description of the schedule of fees and the corresponding schedule of discounts must be provided in the application. An example Fee Schedule is included in the application kit.

- (19) Question: May an AFL demonstration project deny services because of a client's inability to pay?**

**Answer:** No. A grantee under this program may not, in any case, discriminate with regard to the provision of services to any individual because of the individual's inability to provide payment for such services, except that in determining the ability of an unemancipated minor to provide payment for services, the income of the family of an unemancipated minor shall be considered in determining the ability of such minor to make such payments unless the parents or guardian of the unemancipated minor refuse to make such payments.

- (20) Question: What happens to monies collected by projects as fees?**

**Answer:** They are put back into the program, as mandated in the legislation.

- (21) Question: Does Title XX specifically exclude using OAPP grant funds for any activity?**

**Answer:** A. Yes. Section 2004(b) prohibits the use of AFL grant funds for the provision of family planning services other than counseling and

referral services unless appropriate family planning services are not otherwise available in the community.

- B. OAPP funds may not be used to supplant or substitute for costs currently funded from any other source.
- C. Section 2011(a) prohibits projects from providing abortions, abortion counseling, or referral either directly or through subcontract and from advocating, promoting or encouraging abortion.
- D. For a description of the allowability of specific costs, see 45 Code of Federal Regulations (CFR) section 74.27.

**(22) Question: How are the terms "network," "partnership," and "linkage" defined?**

**Answer:** A network, partnership, or linkage exists when one agency, acting as an anchor or broker, contacts other agencies which provide for the delivery of services necessary to a comprehensive program and takes responsibility for assuring that all services are in place and delivered. A statewide network also may be created to link a diverse group of agencies at State and local levels.

**(23) Question: May referrals be counted as services? For example, if a program does not provide a particular service essential to the program, may it refer clients to another agency for this service?**

**Answer:** Yes. However, it is not enough simply to make the referral or to call another agency and ask if it will provide the service. An acceptable referral process must include a mechanism for making referrals, a procedure for follow-up of referrals, and a method to evaluate the success of the process in terms of impact on client outcomes. A letter of agreement with each referral agency should be written, signed by the agency, and should have been attached to your original application. If subsequent linkages are made after the Notice of Grant Award, send a copy of the agreement to your Project Officer for the official OAPP file. A letter of agreement should include a specific description of the service(s) the referral agency is agreeing to provide upon funding.

**(24) Question: An AFL project is invited to present a program to adolescents attending a church-affiliated summer camp or school. Does this present a problem?**

**Answer:** No. Projects should handle requests for AFL presentations in an evenhanded fashion which neither discriminates against, nor favors, religion, a particular religious doctrine or affiliation, or non-religion (secular). AFL project services should be offered in a religiously neutral fashion, and decisions about where to offer presentations or provide services should be made on program relevant criteria such as efficiency, need, public

requests, or geographic balance rather than on any religion-related criteria.

- (25) **Question: A religiously affiliated grantee operates a care or prevention project which provides shelter and a variety of services for teens. Every day at a certain time, a message is announced over the loudspeaker that a worship service is being held in the chapel for anyone who cares to attend. Attendance is voluntary, both for AFL clients and others at the shelter. Neither the cost of the room nor the salary of the leader of the service is paid for with AFL funds. Does this present a problem?**

**Answer:** No, it does not since attendance is voluntary and neither the cost of the room nor the salary of the service leader is paid for with AFL funds.

- (26) **Question: A project runs a residential care or prevention program which provides shelter and a variety of services for teens. The organization which sponsors the project makes religious counselors available for AFL clients and others at the shelter. The counselors are not paid for with AFL funds. They do not see AFL clients unless clients specifically request spiritual counseling. Does this present any problem?**

**Answer:** No, as long as the counseling is requested voluntarily by the client, the counseling is not paid for with AFL funds, and the counseling is performed at some time or place other than at the same time and location as the AFL funded services.

- (27) **Question: A maternity home/residential facility houses a library with many types of books, including some of a specific religious nature, such as Bibles and prayer books. These books were not purchased with AFL funds. Does this present any problem?**

**Answer:** No. It would be a problem only if the facility urges that the person receiving AFL funded services also read the material.

- (28) **Question: May an AFL project refer clients to religiously affiliated service providers?**

**Answer:** Yes. Although all referrals for AFL services must be provided in a religiously neutral manner, if a religiously affiliated provider is the best referral for the client, then the fact that the provider happens to be religiously affiliated should be no bar to the referral. Thus, an AFL project should not steer an AFL client toward or away from religiously affiliated referral agencies in referrals for services authorized under the Act. When making any type of referral, the AFL project should consider only the professional qualifications, availability, accessibility, and the conduct of the referral agency. In addition, the terms and conditions of the grant award apply to all aspects of the AFL project, whether provided on site or by referral and whether provided by the grantee, a subgrantee or anyone else who provides project services.

- (29) **Question: A grantee is located in a geographic region in which the population is**

**predominately one particular religious denomination. Project services are available to anyone, regardless of religious denomination. However, due to the nature of the area, most of the clients are of a single denomination. Does the fact that most clients are of one denomination present a problem?**

**Answer:** AFL grantees may be affiliated with a particular religious denomination. AFL projects must be accessible to the public generally, regardless of the client's religious denomination. Grantees must assure that information about their AFL projects is broadly disseminated throughout the community, including through public media, such as radio or television, and advertisements in public facilities or areas. Additionally, an AFL project is prohibited from selecting clients based on their religious affiliation. No problem is presented, however, where most of the clients are of a single denomination due to the fact that the grantee is located in a geographic region in which the population is predominantly that denomination or for reasons unrelated to the grantee's selecting of clients based on their religious affiliation (e.g., coincidences, accessibility of the project to a particular population group, comfort level of particular client population group with the project).

**(30) Question: In counseling an adolescent, in what context, if any, may a counselor help the client explore the connection between her religious views, if any, and the issue at hand (crisis pregnancy, sexual activity, etc.)?**

**Answer:** During individual counseling sessions, an adolescent's religious beliefs may arise in two contexts:

(A) when the adolescent raises the issue of her/his religious beliefs, or

(B) when the counselor believes that it is important for the adolescent to consider a variety of factors (including parental and peer values and moral beliefs) in order to make his/her own decisions responsibly.

In both of these contexts, the key principle is that AFL funded program counseling must be neutral as to religion. That is, the counseling may not disparage or discourage religion in any way, nor may the counseling engage in any inherently religious activities such as sectarian instruction, worship, prayer, proselytization. Thus, in the first situation, the counselor should acknowledge the importance of the role religious beliefs play in an individual's decision, but must refer the client to other sources of counsel outside the project (parents, religious leaders, etc.) to explore the substance of the relevant religious beliefs. If the adolescent wishes specific guidance relating to her religious beliefs, she should be told to discuss the matter with her parents or the religious counselor of her choice outside of the project.

In the second situation, it is important for the counselor to encourage a client to make decisions with reference to the client's own views on appropriate and moral conduct, whether those spring from religious or non-religious beliefs. If, as a result of that discussion, an AFL

client requests guidance on religious issues, she should be told to discuss the matter with her parents or the religious leader of her choice outside of the project. Under no circumstances may a counselor express a judgment with regard to a client's religious or non-religious beliefs, seek to change the religious or non-religious beliefs of a project client, or in any way favor religious over non-religious beliefs or vice versa in the context of helping a client explore her own moral views. The counselor may wish to explain that the project is a government sponsored project and, therefore, religious counseling or teaching, while very important to many people, is beyond the scope of the program.

In group sessions, an instructor may note that religious beliefs regarding sexual behavior may play an important role in affecting an individual's views, and may permit discussion on this point as long as the instructor does not convey a position. The instructor should suggest that participants consult with their parents or religious leader for a follow-up discussion on this matter.

- (31) **Question: An adolescent in an AFL prevention project requests a referral for family planning services, but the AFL grantee does not directly refer for family planning services. Is the grantee required to provide family planning counseling and referral services?**

**Answer:** A prevention grantee may not provide direct referrals to family planning agencies or clinics, but may refer the AFL clients to a care project office, or to the referring agency for further advice.

- (32) **Question: May AFL projects provide any form of abortion counseling?**

**Answer:** AFL projects must comply with the statutory prohibition against advocating, promoting, encouraging or providing abortions.

- (33) **Question: May AFL projects promote adoption among clients?**

**Answer:** Yes. The promotion of adoption is permitted and is encouraged as part of the legislation under which AFL operates.

- (34) **Question: Project staff is discussing with adolescents reasons for postponing premarital sexual activity. An adolescent comments that the Bible (or the church) teaches that premarital sexual activity is wrong and cites references. Class participants want to discuss this and ask about other religions' teachings on this topic.**

**(a) How should this situation be handled?**

**(b) How should the situation be handled if this was a class involving parents and teens together or parents alone, as opposed to adolescents alone?**



**Answer:** (a) The teacher may acknowledge that many faiths teach that premarital sexual activity is wrong, and that an individual's faith may play an important role in making a decision on this matter. It would be inappropriate for the teacher to say or imply that religion is irrelevant to the topic, since this would violate the principles of neutrality with respect to religion. Depending on the time permitted and the level of interest expressed by the adolescents, it is acceptable to explore a variety of religious and nonreligious teachings on the subject of premarital sexual activity, although the teacher may not convey any view as to which one is the better view. The teacher should suggest that further discussion or questions should be addressed to parents and/or clergy.

(b) If parents express interest on this subject, the teacher may explore a variety of religious and nonreligious teachings on the subject of premarital sexual activity. The teacher may not convey any view as to which one is the better view. Staff should explain that it is a government sponsored project and, therefore, religious counseling or teaching, while important to many people, is beyond the scope of the program.

#### Questions Regarding Evaluation

**(35) Question: Does Title XX law require the project to involve a university or college in the performance of the independent evaluation?**

**Answer:** Yes. However, the independent evaluation may be conducted through another entity with staff from a college or university involved in the monitoring and evaluation of the project. The entities to be involved in the evaluation must be identified, their roles clearly described and their capability documented in the proposal. Their role and willingness to participate in the project should be specified in the written agreement included in your original application.

**(36) Question: May an applicant/grantee contract with an evaluator affiliated with a research organization rather than with a local college or university?**

**Answer:** Yes. However, the applicant/grantee must still have a working relationship with someone from a college or university in the applicant's state who will serve as a consultant to the program.

**(37) Question: Is it possible to spend more for evaluation of the OAPP sponsored grant than the five percent limit cited in sec. 2006 (b)(1) of the law?**

**Answer:** Yes. Waivers above the five percent limit on evaluation may be granted in cases where a more rigorous or comprehensive evaluation effort is proposed. As this is a demonstration program, all applications are required to have an evaluation component of high quality consistent with the scope of the proposed project and the funding level. All project evaluations should monitor program processes to determine whether the program has

been carried out as planned and measure the program's outcomes.

#### Questions Regarding the Curricula and Education Materials Review Process

**(38) Question: Must we use curriculum materials for the proposed project?**

**Answer:** Under care announcements, applicants are not required to use any curriculum materials within the AFL care project. Under prevention announcements, applicants are encouraged to incorporate educational materials.

**(39) Question: If we choose to use curriculum materials, must we use a curriculum from the approved list?**

**Answer:** No. An applicant may choose to use curriculum materials from the approved list or may propose to use existing educational materials to implement its demonstration project as long as the materials meet certain requirements and the applicant receives approval from OAPP prior to use in the project. The materials must be medically accurate, must not include sectarian instruction, worship, prayer, or proselytization, and must comply with the statutory prohibition against advocating, promoting, encouraging, or providing abortions.

Curriculum materials that are not included on the approved AFL Curriculum List, have either been disapproved or have not yet been reviewed. If the curriculum has been disapproved, you will need to choose another curriculum. If it has not been reviewed, you should add time for OAPP review and approval.

**(40) Question: How much time should I incorporate for getting materials approved?**

**Answer:** You should plan for an average of four weeks from the time OAPP receives the materials to the time you are notified of the material's status ("approved," "approved with modifications," or "disapproved"). If your materials are "approved with modifications," you should plan for extra time (approximately three weeks) to make the required changes.

**(41) Question: Can I include the cost of curricula and educational materials in my grant?**

**Answer:** Yes, you may include the cost of the materials as well as other costs associated with using a particular curriculum.

**(42) Question: Can I include the cost of staff training by the curriculum developers in my grant?**

**Answer:** Yes, you may include the cost of the training in your budget. Many of the developers of the curricula have training available to assist programs in implementing their curriculum materials.

**(43) Question: Must I use only one curriculum?**

**Answer:** You may use one or more curricula in your project. You may also use parts of several different curricula. However, all of the curricula materials must be reviewed and approved by OAPP prior to use in the funded project.

**(44) Question: What curriculum and/or curriculum materials should I submit with my application?**

**Answer:** You should identify the curriculum that you propose to use (title, author, publisher, publisher's address, copyright date, and edition). Once funded, you will be required to provide the OAPP Medical Education Specialist with a list of all curricula and materials that will be used in your project. The Medical Education Specialist will let you know what materials you will need to submit for OAPP review.

Questions Regarding Grants Management/Budgetary Issues

**(45) Question: How many years of funding can a grantee receive?**

**Answer:** Grants may be approved for project periods of up to five years. Grants are funded in annual increments (budget periods). Funding for all approved budget periods beyond the first year of the grant is contingent upon the availability of funds, satisfactory progress of the project, and adequate stewardship of Federal funds.

**(46) Question: What is a project period and a budget period?**

**Answer:** The project period is the total time for which support of a project has been programmatically approved by OAPP. For budgetary and reporting purposes, funding is provided in annual increments called budget periods.

**(47) Question: Is there a limit to the amount of Federal participation in a project?**

**Answer:** Under the terms of Title XX, Federal participation in an AFL demonstration project may not exceed 70 percent of the total cost of the project for the first and second years, 60 percent for the third year, 50 percent for the fourth year and 40 percent for the fifth and final year. For example, if you are requesting \$100,000 of federal funds for the first year of your program, then the formula would be used as follows:

$$\$100,000 / .70 \times .30 = \$42,857 \text{ (non Federal funds or match needed)}$$

**(48) Question: May the limits of Federal participation be waived?**

**Answer:** The Title XX statute allows for a waiver of the Federal participation limitation.

However, criteria for evaluating a request for a waiver of Federal participation requirements will not be known until final regulations for the program are published. It is anticipated that few if any waivers of the Federal participation requirements will be approved.

**(49) Question: What are the usual sources of matching or other non-Federal funds?**

**Answer:** Matching funds may be obtained from State and local governments, donations, foundations and the documented valuation of in-kind contributions.

**(50) Question: What are in-kind contributions, and may they be used to meet the matching requirements?**

**Answer:** In-kind contributions represent the value of non-cash contributions provided by the grantees or third parties and may be used to meet matching requirements. In-kind contributions may consist of charges for real property and nonexpendable personal property, and the value of goods and services directly benefitting and specifically identifiable to the grant-supported activity. All in-kind contributions must be fairly valued, fully documented and auditable.

**(51) Question: May other Federal funds be used as matching funds?**

**Answer:** Generally, no. However, some funds collected on a fee-for-service basis (i.e., Title XIX funds) may be used for matching provided the grantor agency approves it in advance. In some circumstances other Federal legislation authorizes the use of Federal funds for matching purposes, for example, cost sharing.

**(52) Question: What are indirect costs (IDC)?**

**Answer:** Indirect costs are costs incurred by an organization that are not readily identifiable with a particular project or program but are nevertheless necessary to the operation of the organization and the performance of its programs. The costs of operating and maintaining facilities (utilities) and administrative salaries are examples of the types of costs that are usually treated as indirect costs.

**(53) Question: Are indirect costs allowable under this program?**

**Answer:** Yes, provided that the applicant has a negotiated indirect cost (IDC) rate agreement with HHS or any other Federal agency, or, if not, the applicant submits a proposal to establish an indirect cost rate agreement no later than three months after the beginning date of the grant budget period. IDC proposals are submitted to the Division of Cost Allocation in the appropriate HHS Regional Office. Applicants which have a negotiated IDC rate should submit a copy of the agreement with the application.

**(54) Question: How detailed should a revised budget be?**

**Answer:** In filling out Form 424A (budget information), grantees should be sure to complete Section B, Column 2 to include matching funds for each budget line item and to indicate totals in Column 5. In addition, applicants should include, on a separate sheet, each personnel position, annual salary, percent of time of project, and total Federal funds requested. Grantees should also include a budget narrative which justifies each of the budget categories.

Additional Questions Pertaining Only to AFL Care Programs

**(55) Question: A pregnant adolescent in an AFL care project, who plans to put her baby up for adoption, is of a particular religious denomination. She would like her baby to be placed with a family that is also of that particular religious denomination. May the AFL project refer the adolescent to a particular religiously affiliated adoption agency?**

**Answer:** AFL care programs are required to provide adoption counseling and referral services which present adoption as an option for pregnant adolescents, including referral to licensed adoption agencies in the community if the eligible grant recipient is not a licensed adoption agency. With respect to adoption referrals, it is permissible for an AFL project to refer an AFL client to a particular religiously affiliated adoption agency where the AFL client, who is the birth mother, chooses such an agency as in a situation where she wishes to have her baby placed with a family of that particular religious denomination. A grantee may use as a source for adoption placement or counseling an agency which has religious restrictions on the placement of the child, but the grantee must assure itself that the AFL client is made aware of such restrictions and that she accepts those restrictions before the referral is made. A grantee may not use such an agency with such restrictions as its sole source for adoption referral unless no other adoption agencies exist in the area which would be an appropriate referral agency after consideration of the professional qualifications, availability, accessibility, and conduct of the agency.

**(56) Question: An adolescent in an AFL care project requests a referral for family planning services, but the AFL grantee does not directly refer for family planning services other than natural family planning. How may the grantee comply with the statutory requirement to provide family planning counseling and referral services?**

**Answer:** In order to comply with the statutory requirement to provide family planning referral services, a care grantee need not provide direct referrals to family planning agencies or clinics, but may comply with the statutory requirement by referring AFL clients to a physician, or providing the phone numbers of the local health department or other agency within the local area which provides referral services.